

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF WISCONSIN  
MILWAUKEE DIVISION**

**ANDREW L. COLBORN,**

**Plaintiff,**

**vs.**

**NETFLIX, INC.; CHROME MEDIA LLC,  
F/K/A SYNTHESIS FILMS, LLC; LAURA  
RICCIARDI; AND MOIRA DEMOS,**

**Defendants.**

**Civil No.: 19-CV-484**

**DEFENDANTS CHROME MEDIA LLC, F/K/A SYNTHESIS FILMS, LLC;  
LAURA RICCIARDI; AND MOIRA DEMOS'S  
MOTION FOR SUMMARY JUDGMENT**

Pursuant to Rule 56 of the Federal Rules of Civil Procedure and Civil Local Rules 7 and 56, Defendants Chrome Media LLC (formerly known as Synthesis Films, LLC), Laura Ricciardi, and Moira Demos (collectively, "the Producer Defendants"), through their undersigned counsel, respectfully move the Court for an order granting them summary judgment and dismissing Plaintiff's entire operative complaint against them and all claims therein, with prejudice.

The grounds for this motion are set forth in the accompanying brief, proposed findings of facts, the declaration of Kevin Vick in support of the Producer Defendants' motion for summary judgment with its attached exhibits, the declaration of Laura Ricciardi in support of the Producer Defendants' motion for summary judgment with its attached exhibits, the declaration of Moira Demos in support of the Producer Defendants' motion for summary judgment, the separately-filed declaration of Moira Demos in support of the Producer Defendants' motion to restrict, the audiovisual exhibits to be physically lodged with the Court, and the Parties' stipulations of fact

as filed by co-defendant Netflix, Inc.; the pleadings and records already on file with this Court; and any oral argument permitted by the Court on this motion.

Dated: September 16, 2022

Respectfully submitted,

s/ Kevin L. Vick

Kevin L. Vick (*pro hac vice*)  
Meghan Fenzel (*pro hac vice*)  
JASSY VICK CAROLAN LLP  
355 South Grand Avenue, Suite 2450  
Los Angeles, CA 90071  
T: (310) 870-7048  
F: (310) 870-7010  
kvick@jassylvick.com  
mfenzel@jassylvick.com

*Counsel for Defendant Laura Ricciardi, Moira Demos, and Chrome Media, LLC*

James A. Friedman, SBN 1020756  
GODFREY & KAHN, S.C.  
One East Main Street  
Suite 500  
Madison, WI 53703-3300  
T: (608) 284-2617  
F. (608) 257-0609  
jfriedman@gklaw.com

*Counsel for the Defendants*